

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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CENTRO DE PERIODISMO INVESTIGATIVO,

Plaintiff,

Civil No. 17-1743 (JAG)

v.

**FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,**

Defendant.

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**DEFENDANT’S MOTION FOR AN EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD**

TO THE HONORABLE COURT:

COMES NOW the Defendant, Financial Oversight and Management Board for Puerto Rico (the “Board”), and through the undersigned attorney respectfully states and prays as follows:

1. The Board was served with the above-styled complaint on June 8, 2017. The twenty-one (21) day period for the Board to answer or otherwise respond to the complaint expires on June 29, 2017.

2. On June 16, 2017, the Court ordered both parties to address whether this action is subject to the automatic stay incorporated into Title III of PROMESA. The Board's brief on this issue is due on or before June 26, 2017; Plaintiff's responsive brief is due on or before July 3, 2017. *Docket entry 9.*

3. Considering that (1) the Board’s response to the Complaint would be due before the stay issue is fully briefed (and thus before the Court has an opportunity to address the stay

issue) and (2) that a ruling that the automatic stay applies to this action would at the least postpone (if not eliminate) the need to file an answer or otherwise respond to the complaint, the Board respectfully moves this Court to extend the deadline for filing its response to the complaint by three (3) weeks counted from June 29, 2017, or until July 20, 2017.

4. In support hereof, the Board states that answering or otherwise responding to the complaint before the Court has an opportunity to rule on the automatic stay could result (if the Court grants the stay) in the Board having to unnecessarily spend significant time and costs preparing a response that need not have been filed. And, even if the Court does not stay the proceeding, its ruling may be instructive to any dispositive motion the Board may file, counseling further in favor of a short postponement in the Board's deadline to file its response to the complaint.

In these circumstances, the interests of justice, fairness and avoidance of potentially wasteful and unnecessary litigant expenses dictate that the time to answer or otherwise respond be extended.

WHEREFORE, the Board respectfully moves the Honorable Court to extend the time to answer or otherwise respond to the complaint by three (3) weeks, to July 20, 2017.

Respectfully submitted.

In San Juan, Puerto Rico, this 21st day of June, 2017.

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CERTIFICATE OF SERVICE

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

S/Luis F. del Valle
Luis F. del Valle-Emmanuelli